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Cc: [Short, Thomas](#); [Elizabeth L. DuSold](#); [Ronald Pitzer](#)
Subject: Pristine Meeting Revised Agenda Topics
Date: Wednesday, January 24, 2018 4:57:31 PM

David,

Thank you for your thoughts and suggestions on our evolving agenda for the February 6 meeting. Your comments on the huge amount of work invested by the Pristine Trust companies that has resulted in a "tremendous reduction in GW contamination" are most appreciated. I agree with your assessment on this point. However, our thoughts diverge when it comes to the suggestion to restart the off-site groundwater pumps. As we presented to the Agency when we met in August 2017, the capability of the pump-and-treat system has reached the point of diminishing returns after over 20 years of operation, and off-site contaminants from an unrelated site(s) continue to threaten being drawn into our wells. These factors and the absence of downgradient receptors influenced the Agency's agreement in 2011 for the monitored natural attenuation pilot study to be performed at this point in the remediation strategy.

The original VOC concentrations have been reduced very significantly by the pump-and-treat system. Our consultants believe that VOCs that are sorbed/attached to fine-grained materials make it extremely difficult to cost-effectively remove substantial additional VOCs through pumping, or even pumping enhanced by other means. Therefore, restarting any of the off-site pumps will do nothing more than result in the removal of a minimal amount of contaminants at a high cost. By restarting the off-site pumps, we will only delay the much-needed discussion on the downgradient aquifer, the impact of regional contamination, and the absence of downgradient receptors. Such a delay does not align with the Superfund reforms directive issued by Administrator Pruitt last summer, which we discussed at the August meeting.

With this in mind, we need to come to a mutual understanding of the condition of the regional groundwater, and in particular, the potential use of the groundwater downgradient of Pristine, and just what is it that we are all trying to achieve at this site considering all factors. At this time, we are not aware of any groundwater users downgradient of the Pristine site. Continuing active remediation to attempt to restore the groundwater to "pristine" conditions at this site is not only fruitless, but also overlooks the regional groundwater contamination, a problem that EPA acknowledged as far back as the original 1987 ROD issued for the site.

Therefore, we believe that it is appropriate to include regulatory options on the agenda for the upcoming meeting, as was proposed by the Agency during our meeting last August, and which Tom Short agreed with in his recent emails. Our reference to regulatory options here is meant to include a broader discussion of alternatives for the remaining groundwater contaminants, including ACLs, some type of risk assessment, perhaps additional institutional controls, and maybe even TI. It was the Agency's Superfund managers, including Tom, who noted that, given the

length of time the pump-and-treat remedy has been operating, it is time to reconsider the Pristine site as a whole. Such reconsideration would be in-line with the enhanced interest of Administrator Pruitt in completing site remedies, and getting more sites converted to meaningful redevelopment status.

We would like to leave the broadly-worded agenda intact for the upcoming meeting for the reasons discussed above. But if you want to add specific items under each of the topics, we would certainly support that. It should be noted that we have received the draft SSP&A technical evaluation report, but given its size and scope, we will not be in a position for a detailed technical response at the February 6 meeting. When the Trustees and our consultant have completed the review of the final SSP&A report and any additional comments from the Agency, we will provide a written response, and set up a conference call to discuss the final report.

Please let me know if EPA has any additional questions or comments about our proposed agenda for the February 6 meeting. We too are looking forward to a productive meeting on February 6. Thanks again.

Agenda

1. Introduction
2. Groundwater Status
 - a. Status of groundwater usage in the area
 - b. Downgradient groundwater usage
 - c. Regional contamination of groundwater
3. Reassessment of Remediation Strategy

Ron